

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LORRIE WILKINS, by her next friend, LIANKA )	
FONVILLE, )	
	)
Plaintiff, )	
	)
vs. )	No. 07 C 7093
LINCOLN PARK PLAZA, LLC., an Illinois )	
Corporation; BJB LINCOLN PARK, INC., an )	Judge Pallmeyer
Illinois Corporation; BJB PARTNERS, LLC, an )	Magistrate Judge Cole
Illinois Corporation; LINCOLN PARK PLAZA )	
MANAGEMENT SPE, INC., an Illinois )	
Corporation; DINO VUKIC, Property Manager )	
for Lincoln Park Plaza; and BETH CRUZ, )	
Assistant Property Manager for Lincoln Park )	
Plaza, )	
	)
Defendants. )	

**NOTICE OF MOTION**

To: Cary G. Schiff  
Cary G. Schiff & Associates  
134 N. LaSalle Street, Suite 1135  
Chicago, IL 60602

Please take notice that on September 16, 2008, at 8:45 a.m., or as soon thereafter as the matter may be heard, Plaintiff, by and through her attorneys, shall appear before the Honorable Judge Rebecca R. Pallmeyer, in the courtroom usually occupied by her in the United States District Court, 219 South Dearborn Street, Room 2119, Chicago, Illinois, and shall then and there present the attached Plaintiff's Motion for Default in the above-captioned case, a copy of which is hereby served upon you.

/s/ Nareen Kim

---

One of the Attorneys for Plaintiff

Attorneys for Plaintiff:

Legal Assistance Foundation of Metropolitan Chicago

Richard Wheelock

Nareen Kim

Charles R. Petrof

111 W. Jackson, 3rd Floor

Chicago, IL 60604

(312) 341-1070

**CERTIFICATE OF SERVICE**

I hereby certify that on September 2, 2008, I electronically filed the foregoing Notice of Motion and the attached Plaintiff's Motion for Default with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Cary G. Schiff

I also certify under penalty of perjury that I served the foregoing Notice of Motion and the attached Plaintiff's Motion for Default, by placing it in the U.S. Mail at 111 W. Jackson Blvd, Chicago, Illinois on September 2, 2008 before 5:00 p.m. with proper postage prepaid to:

Cary G. Schiff  
Cary G. Schiff & Associates  
134 N. LaSalle Street, Suite 1135  
Chicago, IL 60602

/s/ Nareen Kim

---

Nareen Kim